

IN THE UNITED STATES DISTRICT COURT  
IN THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA, )

Plaintiff, )

Case No. 3:25-CR-00140

vs. )

**DEFENDANT’S MOTION TO  
CONTINUE TRIAL**

Charles Dalzell, )

Defendant )

COMES NOW, the Defendant, Charles Dalzell, by and through Counsel, Jeremy J. Curran, and hereby moves the Court for an Order continuing the trial date currently set to commence February 10, 2026. The continuance is requested to last for at least sixty (60) days, on the following grounds:

In order to properly represent Defendant, the undersigned need additional time to locate witnesses, to complete investigation, and to prepare for trial. Additionally, Counsel and Defendant wish for additional time to negotiate with the United States on a possible resolution of this matter and to further give Defendant the opportunity to review his discovery. Further, Counsel for Defendant is scheduled for a jury trial in Cass County, North Dakota, in a case that has been pending since 2022 with a defendant who has been in custody for multiple years awaiting trial.

The undersigned, further, represents to the court that this motion is made neither for the purpose of undue delay nor other improper reason. Counsel makes this request for the Defendant in order to have the time necessary for effective preparation, taking into the exercise of due diligence, as well as allowing for previously scheduled criminal trials.

Defendant has been informed and understands that the delay occasioned by this motion is excluded from counting under the Speedy Trial Act, and Defendant has signed a Waiver of Speedy Trial pursuant to 18 U.S.C. § 3161.

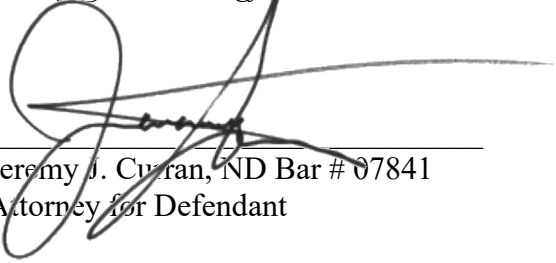
Counsel has spoken to United States Attorney Jeremy Jehangiri, who indicated that the United States has no objection to this Motion.

Dated this 23 day of January, 2026.

**Curran Law Firm, PLLC**

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Attorney for Defendant